

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re:

Leo Martin Urban,  
d/b/a Leo's Bail Bonds Agency, Co.  
f/d/b/a Leo's Bonds Company,  
f/d/b/a Leo's Bonds, LLC

Debtor.

Hon. Jeffrey R. Hughes  
Case No. 08-09535-jrh  
Chapter 7  
Case Filed: 10/27/2008

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Leo Martin Urban,

Plaintiff,

v

Michigan Department of Treasury,

Defendant.

Adv. Proceeding No.  
09-80069

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DEFENDANT'S RULE 26(a) DISCLOSURES

Defendant, Creditor, Michigan Department of Treasury, through its Attorneys, Attorney General Michael A. Cox and Assistant Attorneys General, Amy M. Patterson and Bradley K. Morton hereby submits the following as its Rule 26(a) and Fed. R. Bankr. P. 7026 disclosure as previously disclosed to Debtor's Attorney during the telephonic conference on April 21, 2009 as follows:

1. The individual or entity that is likely to have discoverable material for Defendant is Defendant, Michigan Department of Treasury, which can be contacted through counsel. Treasury will call necessary representatives to support its assertion that Plaintiff is a responsible corporate officer for the taxes at issue in this case. At this time Treasury intends to call Angela Hodges as a witness to confirm the Debtor's corporate officer liability. However Treasury reserves the right to supplement another witness in place of Ms. Hodges if necessary. Treasury witnesses may be contacted through counsel for Defendant.

2. Documents that Treasury will utilize to support its claims against Plaintiff include, but are not limited to:

- a. All tax returns filed on behalf of 2 Feathers Roadhouse, Inc.;
- b. All assessments issued against 2 Feather Roadhouse, Inc.;
- c. All assessments issued against Leo Urban regarding corporate office liability for 2 Feathers Roadhouse, Inc.;
- d. Defendant shall produce the documents to Plaintiff's counsel as soon as they are received from Treasury;
- e. Any rebuttal documents necessary to rebut claims of the Plaintiff regarding his liability for the taxes at issue;
- f. Treasury reserves the right to supplement and amend this list throughout the discovery process in this case.

3. There are no damages alleged in this matter.

4. There is no insurance agreement at issue in this matter.

Respectfully submitted,

/s/ Bradley K. Morton  
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Dated May 6, 2009